

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SIBYL COLON,

Plaintiff,

- against -

THE CITY OF NEW YORK, *et al.*,

Defendants.

ALLISON WILLIAMS,

Plaintiff,

- against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

No. 16-CV-4540
(VSB)(OTW)

**DECLARATION OF
MARCELA MEDINA IN
SUPPORT OF THE NYCHA
DEFENDANTS' MOTION
FOR SUMMARY JUDGMENT
AGAINST PLAINTIFFS
SIBYL COLON AND
ALLISON WILLIAMS**

No. 16-CV-8193
(VSB)(OTW)

Consolidated for Pre-Trial Purposes

Marcela Medina declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am the Senior Advisor to the General Manager of Defendant New York City Housing Authority (“NYCHA”). I submit this Declaration in support of the NYCHA Defendants’ Motions for Summary Judgment against Plaintiff Sibyl Colon (“Ms. Colon”) and Plaintiff Allison Williams (“Ms. Williams”) based upon my personal knowledge of the matters asserted herein.

2. In 2015, I was the State Legislative Affairs Officer in the NYCHA Intergovernmental Department, and I reported to the Director of the Intergovernmental Department, Brian Honan. It was my regular business practice to take notes during meetings,

whether they occurred at NYCHA or externally with third parties. For the most part, I kept a notebook, which I used to record my notes.

3. During the meeting with former City Council Speaker Melissa Mark-Viverito (the “Former Speaker”) on July 30, 2015, which I attended with Brian Honan, I took notes in my notebook. I understand that a copy of my notes, which were copied from my notebook, is attached to the Declarations of Jane E. Lippman in Support of the NYCHA Defendants’ Motion for Summary Judgment Against Plaintiff Sibyl Colon (“Lippman Colon Declaration”) and Plaintiff Allison Williams (“Lippman Williams Declaration”) as Exhibit 30 (Lippman Colon Declaration) and Exhibit 24 (Lippman Williams Declaration).

4. On July 31, 2015, I engaged in an email exchange with Jennifer Montalvo, who was the Deputy Director of my department, regarding the July 30, 2015 meeting with the Former Speaker. In my email to Ms. Montalvo, I wrote, “the insult things didn’t come up.” By “insult things,” I was referring to a derogatory remark Mill Brook Houses Manager Allison Williams made during a tenant association meeting. Specifically, in the spring of 2015, I learned from one of the Former Speaker’s staff members, Diana Ayala, that during a tenant association meeting, Ms. Williams told the Mill Brook Houses residents that she did not want to hear any “mira mira talk.” Many, if not most, of the Mill Brook residents were Hispanic, and some had limited or no English language proficiency. Ms. Williams’ no “mira mira talk” comment was offensive and inappropriate. My supervisor, Brian Honan, was also made aware of this comment. I understand that a copy of my July 31, 2015 emails with Jennifer Montalvo is attached to the Lippman Colon Declaration as Exhibit 30 and to the Lippman Williams Declaration as Exhibit 24.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 14, 2020.



Marcela Medina